

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

UNITED STATES OF AMERICA, )  
                                  )  
                                  )  
v.                              )      **Cr. No. 1:19-cr-10040-JTF**  
                                  )  
ALEXANDER ALPEROVICH, M.D. )

**MOTION TO SEAL DEFENDANT ALEXANDER ALPEROVICH'S MOTION FOR *IN CAMERA* REVIEW AND TO COMPEL PRODUCTION OF DISCOVERY MATERIAL**

COMES defendant ALEXANDER ALPEROVICH through counsel, pursuant to Appendix A of the Local Rules, Policy No. 8 (Sealed Documents), and respectfully requests that the Court enter an order sealing Dr. Alperovich's motion for *in camera* review and to compel the production of discovery materials, as well as its memorandum of support, until further order of the Court. The associated motion, memorandum, and its referenced exhibit contain potentially privileged communications or material that should be redacted pursuant to Rule 49.1 of the Federal Rules of Criminal Procedure. Accordingly, the motion to seal is necessary to protect the confidentiality of the potentially privileged information.

The government's Prosecution Team will not be delivered a copy of these pleadings. *See* (Order, Doc. 182).

Respectfully submitted this 4<sup>th</sup> day of February 2021, by:

**RITCHIE, DILLARD, DAVIES & JOHNSON, P.C.**

/s/Stephen Ross Johnson  
**STEPHEN ROSS JOHNSON, TN BPR #022140**  
606 W. Main Street, Suite 300  
Knoxville, TN 37902  
(865) 637-0661  
[johnson@rddjlaw.com](mailto:johnson@rddjlaw.com)

**MASSEY MCCLUSKY MCCLUSKY & FUCHS**

/s/William D. Massey  
**WILLIAM D. MASSEY, TN BPR #009568**  
3074 East Street  
Memphis, TN 38128  
(901) 384-4004  
w.massey3074@gmail.com

*Attorneys for Alexander Alperovich, M.D.*

**CERTIFICATE OF SERVICE**

I hereby certify that on February 4, 2021, a copy of the foregoing was filed electronically via ECF and that service on the following was accomplished via Federal Express and electronic mail:

Bennett P. Starnes  
Kathryn C. Furtado  
Trial Attorneys  
United States Department of Justice  
Criminal Division, Fraud Section  
Privilege Review Team  
1400 New York Avenue NW  
Washington, DC 20530  
Tel: (202) 616-2684  
Bennett.Starnes@usdoj.gov  
Kathryn.Furtado@usdoj.gov  
*Counsel for the United States*

Nishay Sanan  
53 W. Jackson, Suite 1424  
Chicago, IL 60604  
(312) 692-0360  
nsanan@aol.com  
*Counsel for Defendant Andrew Rudin*

Claiborne H. Ferguson  
294 Washington Avenue  
Memphis, TN 38103  
(901) 529-6400  
claiborne@midsouthcriminaldefense.com  
*Counsel for Defendant Jeffrey Young, Jr.*

s/Stephen Ross Johnson